

Richard L. Happ
Fowler Specialty Packaging, Inc.
P.O. Box 692
Fowler, IN 47944

Re: 007-12289
First Minor Permit Modification to
Part 70 No.: T 007-7645-00010

Dear Richard L. Happ:

Fowler Specialty Packaging, Inc. was issued a Part 70 permit on March 30, 1998 for operation of stationary paper and allied products printing facility. A letter requesting changes to this permit was received on April 20, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding an exempt unit, which was permitted under 007-11776, to this permit. Additionally, OAM has found an error in the description of the flexographic press that has been corrected in accordance with CP 007-10026.

The company had requested removal of the condition related to quarterly reporting in their Part 70 permit. The reporting of VOC emissions is required to show compliance with condition D.3.1. Hence, their request to remove the condition cannot be approved.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File – Benton County
U.S. EPA, Region V
Benton County Health Department
Air Compliance Section Inspector – Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Fowler Specialty Packaging, Inc.
407 South Adeway Road
Fowler, Indiana 47944**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T007-7645-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 30, 1998

First Significant Permit Modification 007-9795

Issuance Date: June 2, 1999

First Administrative Amendment 007-11025

Issuance Date: August 23, 1999

First Minor Permit Modification T007-12289	Pages Affected: 5, 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper and allied products printing operation.

Responsible Official: Richard L. Happ
Source Address: 407 South Adeway Road, Fowler, Indiana 47944
Mailing Address: P. O. Box 692, Fowler, Indiana 47944
SIC Code: 2671
County Location: Benton
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S_5 and S_8);
- (2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S_2 and S_3);
- (3) One (1) flexographic printing press, identified as press No. 4, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of thirty-one (31) inches, exhausting to two (2) stacks (S_2 and S_3);
- (4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S_4); and
- (5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of twenty (20) inches; and exhausting to one (1) stack (S_{17}).
- (6) Nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, exhausting to the plant atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; and
- (2) One (1) 5.23 million British thermal units per hour (mmBtu/hr) natural gas or fuel oil No. 2 fired boiler.

SECTION D.3

FACILITY OPERATION CONDITIONS

- (5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of twenty (20) inches, exhausting to one (1) stack (S₁₇)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The input VOC usage by the flexographic printing press shall be limited to 35.7 tons per 12 month period. This is equivalent to VOC emissions of 35.7 tons per 12 month period, rolled on a monthly basis. This VOC limit will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]

The volatile fraction of the ink, as it is applied to the substrate, of the flexographic printing press shall contain twenty-five (25%) by volume or less of organic solvent and seventy-five (75%) by volume or more of water.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 Volatile Organic Compound (VOC) Limitation for Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The Permittee shall record each month and report each quarter the total amount of volatile organic compounds (VOC), including clean-up solvents, delivered to the applicators for this printing press.

D.3.6 Volatile Organic Solvent Used in the Inks [326 IAC 8-5-5(c)(1)]

The Permittee shall record the VOC content in each ink used when the printing press is in operation.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Minor Permit Modification to
a Part 70 Operating Permit**

Source Background and Description

Source Name:	Fowler Specialty Packaging, Inc.
Source Location:	407 South Adeway Road, Fowler, IN 47944
County:	Benton
SIC Code:	2671
Operation Permit No.:	T007-7645-00010
Operation Permit Issuance Date:	March 30, 1998
Permit Modification No.:	T007-12289-00010
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Fowler Specialty Packaging, Inc. relating to the operation of stationary paper and allied products printing facility.

History

On April 20, 2000, Fowler Specialty Packaging, Inc. submitted an application to the OAM requesting to remove condition related to quarterly monitoring from their Part 70 permit for their existing plant. Fowler Specialty Packaging, Inc. was issued a Part 70 permit on March 30, 1998. Upon further review OAM has determined other modifications which are carried out as part of this permit modification.

Existing Approvals

The source was issued a Part 70 Operating Permit T007-7645-00010 on March 30, 1998. The source has since received the following:

- (a) First Significant Permit Modification No.: 007-9795, issued on June 2, 1999; and
- (b) First Administrative Amendment No.: 007-11025, issued on August 23, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 20, 2000.

Permit Changes

1. Under the Exemption status 007-11776 issued to the Permittee on February 22, 2000, One (1) flexographic tail printer, identified as TP-49, utilizing water based inks, with a maximum line speed of 250 feet per minute and a maximum printing width of twenty-eight (28) inches, exhausting to the plant atmosphere was permitted for construction and operation. This source is hereby added to the Part 70 operating permit issued to the Permittee. The Exemption status 007-11776 is no longer in force from date of issue of this modification. No changes to the Part 70 Operating Permit 007-7645 are required, because this is an insignificant activity and has no specific rule applicable to it.
2. OAM has observed that the description of flexographic printing press #6 in Part 70 Permit 007-7645 shows print width as 36 inches. This needs to be changed to 20 inches per CP 007-10026 issued on December 3, 1998.

Section A.2 and D.3 of the Part 70 Operating Permit are modified as follows (using Bold and strikeout method):

- (5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of ~~36.0~~ **20** inches; and exhausting to one (1) stack (S₁₇).
3. The company had requested the removal of the condition related to quarterly reporting in their Part 70 permit. The reporting of VOC emissions is required to show compliance with condition D.3.1. Hence their request to remove the condition is not approved.

Justification for Modification

This Part 70 Permit is being revised through a Minor Permit Modification. This Modification is being performed pursuant to 326 IAC 2-7-12(b). It is minor because an already permitted unit is being added to the permit and a change in the descriptive information is being performed.

Conclusion

The operation of this stationary paper and allied products printing facility shall be subject to the conditions of the attached Minor Permit Modification to 007-12289-00010 Part 70 Permit.